

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
AND WELFARE FUNDS,)
)
Plaintiff,)
) No. 06 C 6728
v.)
) Judge Pallmeyer
LATIN PAVERS, INC., an Illinois corporation)
not in good standing,) Magistrate Judge Ashman
)
Defendant.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on December 6, 2006 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon LATIN PAVERS, INC., an Illinois corporation, not in good standing, on January 3, 2007 and a copy of the proof of service was filed with the court on January 4, 2007.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$1,662.85 Pension
\$2,902.68 Welfare
\$2,960.00 Attorneys fees
\$451.60 Court costs
\$7,977.13

WHEREFORE, Plaintiff prays for the entry of judgment against Defendants,
LATIN PAVERS, INC., an Illinois corporation not in good standing and in favor of
Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS
WELFARE AND PENSION FUNDS in the amount of \$7,977.13.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

s/John J. Toomey
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Dated: June 26, 2007